

STATE IDENTIFICATION NUMBER  
(If Applicable)

? { ILDC56648355  
EPA IDENTIFICATION NUMBER  
INT190010041

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS  
Form B Generator Inspection\*  
(40 CFR Part 262)

EPA Region 5 Records Ctr.



267381

I. General Information:\*

(A) Installation Name: Pozny Corp., Orland Barrel & Drum Service  
(B) Street: 600 S. Arbogast St.  
(C) City: Griffith (D) State: Indiana (E) Zip Code: 46319  
(F) Phone: (219) 924-6474 (G) County: Lake

(H) Date of Inspection: 6/29/81 Time of Inspection (From) 2:00 (To) 4:00 PM

(I) Weather Conditions: partly cloudy, 90°F

(J) Person(s) interviewed	Title	Telephone
<u>Robert E. Pozdra</u>	<u>Corporation President</u>	
<u>Headquarters Office is at:</u>		
<u>14560 Ridge Avenue</u>		
<u>Orland Park, Ill. 60462</u>		

(K) Inspection Participants	Agency/Title	Telephone
<u>Richard E. Boice</u>	<u>USEPA/Chemical Engineer</u>	<u>(312) 886-6220</u>

(L) Preparer Information

Name	Agency/Title	Telephone
<u>Richard E. Boice</u>	<u>USEPA/Chemical Engineer</u>	<u>(312) 886-6220</u>

\*Do not use this form if Generator is also a treatment, storage, and/or disposal facility.  
Complete form "A" if the Generator is also a TSD facility.

## II. BRIEFLY DESCRIBE SITE ACTIVITY

*This facility stores and reconditions used barrels for resale. The reconditioning facility included a hot caustic wash tank, a rinser, a dryer and a paint booth. According to Mr. Pazdro, this facility reconditions only barrels that contained light solvents such as paint thinner. Barrels that contained other materials such as paint or resins are sold to other barrel reconditioners.*

## III. MANIFEST REQUIREMENTS (Subpart B)

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?				<i>Mr. Pazdro reported that no shipments of hazardous wastes have been made since Nov. 19, 1981.</i>
(B) Do the manifest forms reviewed contain the following information? (If possible, make copies of, or record information from, manifests that do not contain the critical elements)				
1. Manifest document number?	___	___	___	
2. Name, mailing address, telephone number, and EPA ID number of generator?	___	___	___	
3. Name and EPA ID Number of transporter(s)?	___	___	___	
4. Name, Address, and EPA ID Number of designated permitted facility and alternate facility?	___	___	___	

\*Not Inspected



Yes No NI\* Remarks

3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from facility's property line)?

*No storage of RCRA regulated hazardous waste on-site.*

4. If wastes are stored in tanks, are the tanks managed according to the following requirements:

*Material in the caustic wash tank is in process material until removed from tank. There are no other tanks.*

- a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?

- b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?

- c. Do continuous feed systems have a waste-feed cutoff?

- d. Are required daily and weekly inspections done?

- e. Are reactive and ignitable wastes in tanks protected from sources of reaction and ignition, or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements)

- f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)

- g. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?

Record the following information:

Tank capacity? \_\_\_\_\_ gallons

Tank diameter? \_\_\_\_\_ feet

Distance of tank from property line? \_\_\_\_\_ feet

(see tables 2-1 through 2-6 of NEPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance)

V Training, Emergency Procedures

	YES	NO	NI*	Remarks
A. Do Personnel training records include: (Effective 5/19/81)				
1. Job Titles?	—	X	—	(1)
2. Job Descriptions?	—	X	—	(1)
3. Description of training?	—	X	—	(1)
4. Records of training?	—	X	—	(1)
5. Have facility personnel received required training by 5-19-81?	—	X	—	(1)
6. Do new personnel receive required training within six months?	—	X	—	(1)
B. Preparedness and Prevention (Part 265, Subpart C)				
1. Maintenance and Operation of Facility:	—	—	—	—
a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?	—	X	—	—

2. If required, does this facility have the following equipment?

a. Internal communications or alarm systems?

— X —

However, this is such a small facility that a voice signal could probably be heard throughout the building.

b. Telephone or 2-way Radios at the scene of operations?

X — —

Telephone is in office.

c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?

— X —

There is no spill control equipment, or structures. There is no decontamination equipment.

Indicate the volume of water and/or foam available for fire control

There were three fire extinguishers in the building.

3. Testing and Maintenance of Emergency Equipment:

a. Has the owner or operator established testing and maintenance procedures for emergency equipment?

— X —

Two of the three fire extinguishers were discharged.

b. Is emergency equipment maintained in operable condition?

— X —

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4. Has owner/operator provided immediate access to internal alarms (if needed)?

— X —

Voice contact should be good enough as long as someone else is in the plant building.

5. Is there adequate aisle space for unobstructed movement?

X — —

C. Contingency Plan and Emergency Procedure (Part 265, Subpart D)

1. Does the contingency plan contain the following:

a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part as applicable)

*There was no contingency plan.*  
*(2)*

b. Arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to §265.37?

c. Names, addresses, and phone numbers (Office and Home) of all persons qualified to act as emergency coordinator.

d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list, and a brief outline of its capabilities?

e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes.

2. Are copies of the Contingency Plan available at site and local emergency organizations?

— X —

3. Emergency Coordinator

a. Is the facility emergency Coordinator identified?

— X —

b. Is coordinator familiar with all aspects of site operation and emergency procedures?

— X —

c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?

— X —

4. Emergency

If an emergency situation has occurred at this facility, has the emergency coordinator followed the emergency procedures listed in §265.56?

— — — NA

VI. RECORDKEEPING AND REPORTING  
(Part 262, Subpart D)

(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?

X — — Mr. Pazdro is aware of this requirement,

(B) Has the generator submitted Annual Reports and Exception Reports as required?

— — — NA

VII. INTERNATIONAL SHIPMENTS  
(Part 262 Subpart E)

(A) Has the installation imported or exported hazardous waste?

— X —

(If A was answered Yes, then complete the following as applicable.)

1. Exporting Hazardous waste,  
has a generator:

a. Notified the Administrator  
in writing? \_\_\_\_\_

b. Obtained the signature of the  
foreign consignee confirming  
delivery of the waste(s) in the  
foreign country? \_\_\_\_\_

c. Met the Manifest requirements? \_\_\_\_\_

2. Importing Hazardous Waste,  
has the generator:

Met the manifest requirements? \_\_\_\_\_

VIII. Remarks

REMARKS: I arrived at the site at approx 2:00PM.

Mr. Pazdro greeted me. First he showed me the  
res conditioning facility. It was not in operation.  
Only the vent fan for the paint booth was on  
in order to ventilate the building. This fan was  
the only ventilation other than open doors. The  
building consisted of a front block building  
with a backroom addition made of corrugated  
metal.

First Mr. Pazdro showed me the caustic  
barrel washing tank. It was approx 2' full.  
There was a thick layer of what appeared to  
be dirty oil on top. Next he showed me  
the rinsers. It rinses one barrel at a time.

He said that the dirty water from the rinsers is pumped into the caustic tank. However, the caustic tank seldom needs to be emptied because enough water is evaporated from it to make up for the amount added. Mr. Payton showed me the burners used to heat the caustic tank.

Oil skimmed from the top of the caustic tank is stored in barrels on-site. He is unsure whether the waste is RCRA-hazardous but he is planning to pay American Chemical to pick it up and recycle it. When the caustic tank is cleaned out, the waste is probably hazardous. He was unsure whether the amount removed at one time would be more than the small quantity generator exclusion. From the rinsers the barrels go to the dryer and the paint booth.

Next Mr. Fajardo showed me the yard. He identified the storage on-site as shown on the attached sketch. I noticed no spillage on-site. The barrels along the north side of the back room were on a slag base. If such a slag base is also along the west side of the building, it would make any spillage from the building soak into the ground. The foreman dug three approx. one foot deep holes for me to check for buried drums. None were detected and the ground appeared to be well packed.

after I left Fazney Corp., I contacted Jim Tarpo, President of American Chemical. He walked with me to check for signs of chemical spillage on the property adjacent to Fazney Corp. and owned by American Chemical. We observed no chemical spill residue.

X = APPROXIMATE LOCATIONS OF  
A FACILITY EMPLOYEE DUG ONE FOOT  
DOWN FOR BURIED BOMBS.

STACK OF CRUPP CARTRIDGES  
55 GALLON

UNITED STATES DEPARTMENT OF JUSTICE  
FEDERAL BUREAU OF INVESTIGATION  
WASHINGTON, D. C. 20535

EMPTY TRAILER

0000000000

PLASTIC BARRELS

SLAG FILE

EMPTY DAMAGED  
BARRELS TO BE  
SOLD FOR CASUALTIES

02722000  
02722000  
02722000  
EMPTY PLASTIC  
LINED PAPER L

EMPTY BARRELS  
TO BE RECONDI-  
TIONED

Alvin

4 BARRELS OF  
KIMMINGHAM  
(C) 1971

AMERICAN

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